

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PASHA S. ANWAR, et al.,

Plaintiffs,

-against-

09cv118-VM-FM

FAIRFIELD GREENWICH LTD., et al.,

Defendants.

**NEW GREENWICH LITIGATION TRUSTEE, LLC'S NOTICE OF MOTION
TO INTERVENE FOR LIMITED PURPOSES AND FOR ENTRY OF
ORDER UNSEALING CLASS CERTIFICATION MOTION PAPERS**

PLEASE TAKE NOTICE THAT, pursuant to the Order dated April 30, 2015 (ECF No. 1371), and upon the accompanying memorandum of law and all prior papers and proceedings had herein, New Greenwich Litigation Trustee, LLC, as Successor Trustee of the Greenwich Sentry, L.P. and Greenwich Sentry Partners, L.P. Litigation Trusts, respectfully moves before the Honorable Frank Maas, Chief United States Magistrate Judge, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York, for entry of an Order:

- (i) Pursuant to Fed. R. Civ. P. 24(b), permitting movant to intervene in this action for the limited purpose of this motion;
- (ii) Unsealing the documents filed by the parties in support of and in opposition to plaintiffs' motion for class certification (which motion was granted by Decision and Order dated March 3, 2015, *see* ECF No. 1357); and
- (iii) Granting such other and further relief as the Court may deem just and proper.

Movant respectfully requests oral argument on this motion.

Dated: New York, New York
May 11, 2015

Respectfully submitted,
MILBERG LLP

/s/ Robert A. Wallner
Robert A. Wallner
Kristi Stahnke McGregor
Charles Slidders
One Pennsylvania Plaza
New York, NY 10119
Tel: (212) 594-5300
rwallner@milberg.com
kmcggregor@milberg.com
cslidders@milberg.com

*Attorneys for Proposed Intervenor New Greenwich
Litigation Trustee, LLC, as Successor Trustee of
Greenwich Sentry, L.P. and Greenwich Sentry
Partners, L.P. Litigation Trusts*